

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

Defendant.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED JUL 24 2008

INDICTMENT

ANGEL CORREA,

08 CRIM 08 Cr.
685

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COUNT ONE

The Grand Jury charges:

1. From in or about April 2005, up to and including in or about January 2007, in the Southern District of New York and elsewhere, ANGEL CORREA, the defendant, unlawfully, willfully and knowingly did remove, obliterate, tamper with and alter identification numbers for motor vehicles and motor vehicle parts, and did aid and abet such activities, to wit, CORREA altered or caused the alteration of motor Vehicle Identification Numbers ("VIN") for certain vehicles.

(Title 18, United States Code, Sections 511 and 2.)

COUNT TWO

The Grand Jury further charges:

2. From in or about April 2005, up to and including in or about January 2007, in the Southern District of New York and elsewhere, ANGEL CORREA, the defendant, unlawfully, willfully and knowingly, having devised a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent

pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting to do so, did place and cause to be placed in post offices and authorized depositories for mail matter, matters and things to be sent and delivered by the Postal Service, and did deposit and cause to be deposited by private and commercial carriers, and did take and receive therefrom such matters and things, and did aid and abet such activities, to wit, CORREA mailed and caused to be mailed fraudulent titles for certain vehicles based on falsified title applications.

(Title 18, United States Code, Sections 1341 and 2.)

FORFEITURE ALLEGATION

3. As the result of committing the offense alleged in Count One of this Indictment, ANGEL CORREA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(5), all property, real and personal, that represents or is traceable to the gross proceeds obtained, directly and indirectly, as a result of the offense.

4. As the result of committing the offenses alleged in Counts One and Two of this Indictment, ANGEL CORREA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), 981(a)(1)(F)(i), and Title 28, United States Code, Section 2461, all property,

real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses.

5. In addition, any motor vehicles with removed, obliterated, tampered with, or altered identification numbers possessed by ANGEL CORREA, the defendant, shall be forfeited to the United States, if consistent with Title 18, United States Code, Section 512.

Substitute Asset Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

b. has been substantially diminished in value; or

c. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 512, 981(a)(1)(C), (D) and 982(a)(5); Title 28, United States Code, Section 2461; Title 21, United States Code, Section 853(p).)

Keith Miller
FOREPERSON

Michael J. Garcia
MICHAEL J. GARCIA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

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ANGEL CORREA,

Defendant.

INDICTMENT

08 Cr.

(18 U.S.C. §§ 2, 511, and 1341)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL

Keith Miller
Foreperson.

Indictment filed, case assigned to
Judge McRae.

J. Moos, USM